

**D. Corrective  
Action**

**Determination: Soil sampling, USTs****PA/VSI Or RFA FILE REVIEW CHECKLIST**

Facility Name: Kvaerner Songer (Penmark Associates, Ltd.)

EPA ID: MID 005 341 979\_\_\_\_ City: 2219 Chapin Jackson, Jackson Co.\_\_\_\_ State: MI\_\_

Name of Reviewer: Maureen McHugh\_\_\_\_ Date of Review: 8/14/08\_\_\_\_

1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: <u>2</u> SWMUs and <u>2</u> AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: _____ SQG, _____ LQG, or _____ Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA? RCRAInfo 380 (1984)
			If Yes, was the closure: <u>X</u> CC, or _____ CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

\_\_\_\_\_ No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

X Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

\_\_\_\_\_ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

## PA/VSI Or RFA FILE REVIEW CHECKLIST

### Notes

EPA approved closure of the entire facility in 1984, but no sampling was conducted at the former outdoor drum storage pad (SWMU1) Facility representatives said it was never used.

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

A leak of PCB-contaminated transformer oil was discovered in 1981, and repaired. The leak was cleaned up.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

5 USTs that help fuel oil, gasoline, and deodorized gasoline were removed from the ground in 1984 but were left onsite. During the VSI, it was noticed that some of the tanks had small holes. No sampling was done when the tanks were removed.

10 PCB-contaminated transformers were located during the VSI. 5 of the transformers are located outdoors on a concrete pad with no diking. Dark oily stains could be seen around the bases of three of the transformers located outdoors, but they appeared to be contained by the concrete floor or pad.

### PA/VSI Recommendations

Collect soil samples from around the concrete pad at the former outdoor drum storage pad (SWMU1). Soil gas sampling at the former underground tank farm (AOC1). Properly dispose of the PCB-contaminate transformers and take wipe and soil samples from around the bases of the transformers to determine the extent of oil leakage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

RECEIVED JAN 25 1993  
WMD RCRA  
RECORD CENTER PA/VSI

REPLY TO THE ATTENTION OF:

HRE-8J

January 25, 1993

Mr. Morton Skolnik  
Penmark Associates  
1000 W. North Avenue  
Chicago, Illinois 60622

Re: Visual Site Inspection  
(Formerly Goodyear Tire and Rubber Co.)  
Jackson, MI  
ID No. MID 005 341 979

Dear Mr. Skolnik:

As indicated in the letter of introduction sent to you on May 4, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

Stevens T. Mason Building, P.O. Box 30028, Lansing, MI 48909

ROLAND HARMES, Director

NATURAL RESOURCES  
COMMISSION

LARRY DEVUYST  
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O. STEWART MYERS  
JOEY M. SPANO

October 22, 1992

Ms. Laura Lodisio, HRE-8J  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

RECEIVED

OCT 29 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Ms. Lodisio:

SUBJECT: Comments on Draft PA/VSI  
Goodyear Tire & Rubber Company  
Jackson, Michigan  
MID 005 341 979

Thank you for the opportunity to review the enclosed draft PA/VSI for the subject facility. Our comments are attached.

This review is intended to identify major deficiencies in the draft PA/VSI. This review does not represent an exhaustive file search or technical analysis, and does not verify the accuracy of information presented in the draft PA/VSI.

Please contact me at Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909, or at the telephone number listed below if you have any questions.

Sincerely,

Kenneth J. Burda, Chief  
Hazardous Waste Permits Section  
Waste Management Division  
517-373-0530

Enclosures

cc: Corrective Action File

PA/VSI Review Comments  
Goodyear Tire & Rubber Company  
MID 005 341 979

Goodyear Tire & Rubber Company was regulated as a storage facility from 1980 to 1984. The facility ceased operations in 1984 and was approved clean closed.

We disagree with the recommendation to only perform soil gas sampling around AOC 1 to determine whether a release occurred. The summary stated that the former locations of the USTs are not known. We recommend that a historical file search be conducted to determine the exact location of the USTs. Once the exact location is determined, we recommend soil sampling of this area in addition to the sampling around AOC 1.



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
5HW-13

26 JUL 1984

Mr. F. C. Betzhold  
Manager  
Chemical Environmental Protection  
The Goodyear Tire and Rubber Company  
Akron, Ohio 44316

Re: Closure Plan  
The Goodyear Tire and Rubber Company  
Jackson, Michigan  
MID 005 341 979


Dear Mr. Betzhold:

On April 11, 1984, and May 4, 1984, The Goodyear Tire and Rubber Company submitted a closure plan for the above referenced facility. The plan called for removal of all waste off-site for disposal, and flushing and venting of tanks and decontaminating the container storage area, if necessary. A 30-day comment period ended on July 26, 1984, and the Agency received no comments.

The closure plan is hereby approved. The Goodyear Tire and Rubber Company also included in the April 11, 1984, submittal, the required closure certification information under 40 CFR 265.115.

Please contact Dr. David Homer of my staff at (312) 886-6146, if you have any questions.

Sincerely,

  
Basil G. Constantelos, Director  
Waste Management Division

cc: Alan J. Howard, MDNR

RECEIVED

JUL 30 1984

HAZARDOUS WASTE DIVISION



June 3, 1992

Mr. Joe Smerglia  
Goodyear Tire & Rubber Co.  
1144 East Market Street  
Akron, OH 44316

**Re: Request for Information**

Dear Mr. Smerglia:

As we discussed in our telephone conversation on June 3, 1992, the following issues need to be addressed for Preliminary Assessment/Visual Site Inspection (PA/VSI) report on the former Goodyear Tire & Rubber Co. (Goodyear) facility in Jackson, Michigan.

- The year the facility was built
- The year Goodyear began operations at the facility
- The names of former owners of the facility, if any, and facility operations under the owner(s)
- A brief description of facility operations under Goodyear, (what was produced and how)
- A general description of waste types and annual waste generation rates, if different from the facility's Part A permit application and the final destination of the wastes (landfilling, incineration, etc.)
- The Part A permit application lists a P117 waste code, that, according to the 1980 Code of Federal Regulations, is thiram, a pesticide. Is thiram also used in the rubber industry?
- Number of people employed at the facility during its years of operation
- Size of facility property
- Size of facility building
- Was hazardous waste managed in areas other than inside Building 6D-Cement House Area prior to the 1980 Part A permit application filing? If so, where?
- A copy of the facility's National Pollutant Discharge Elimination System (NPDES) permit

June 3, 1992  
Page 2

- Five former underground storage tanks (UST) were identified during the VSI. They appeared to have been removed and left on site. Copies of tank removal reports (if any), and information about the former locations and contents of the tanks would be helpful.
- In 1984, Goodyear was issued a Complaint and Notice of Opportunity for Hearing by the U.S. Environmental Protection Agency for four counts of polychlorinated biphenyl (PCB) violations. What was the final outcome of this action?

Your cooperation in supplying PRC Environmental Management, Inc., with the requested information is appreciated. Please call me at 312/856-8794 if you have any questions.

Sincerely,



David J. Berestka  
Environmental Engineer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 4, 1992

Mr. Morton Skolnik  
Penmark Associates  
1000 W. North Avenue  
Chicago, IL 60622

Re: Visual Site Inspection  
Formerly Goodyear Tire and Rubber Co.  
2219 Chapin Street  
Jackson, MI  
EPA ID No. MID 005 341 979

Dear Mr. Skolnik:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for May 21, 1992, at 10:00 a.m. The inspection team will consist of Mary Wojciechowski and David Berestka of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Minnesota Pollution Control Agency (MPCA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Morton Skolnik  
May 4, 1992  
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

*for Sheri L. Branch*  
Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Mohammad Yusaf, MDNR-Jackson  
Ken Burda, MDNR-Lansing  
Dennis Brake, MDNR-Lansing

## **ATTACHMENT I**

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

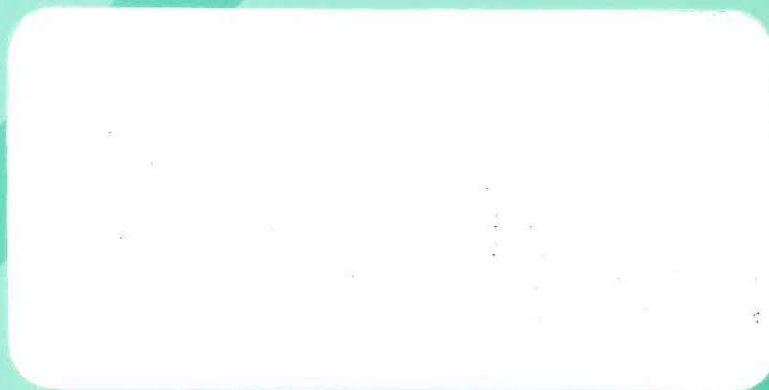
An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0006



# **TES 9**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone III  
Regions 5,6, and 7**

***PRC***

**PRC Environmental Management, Inc.**

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**FORMER GOODYEAR TIRE &  
RUBBER COMPANY FACILITY  
(Currently Owned by Penmark Associates, Ltd.)  
JACKSON, MICHIGAN  
MID 005 341 979**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	MID 005 341 979
Date Prepared	:	December 31, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087MI4K
Prepared by	:	PRC Environmental Management, Inc. (David Berestka)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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### Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES
- D PART A PERMIT APPLICATION PHOTOGRAPH

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## EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former Goodyear Tire & Rubber Company (Goodyear) facility in Jackson, Jackson County, Michigan. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility was first operated by the Kelsey-Hayes Wheel Company and was sold to Goodyear in 1936. Goodyear began operations at the facility in 1937, manufacturing car, truck, tractor, and motorcycle tires. From 1980 to 1984, the facility was regulated both as a generator and a treatment, storage, or disposal facility. The facility was shut down in early 1984 and underwent RCRA closure later that year. The facility employed about 1,400 people when it was closed. Penmark Associates, Ltd. (Penmark) purchased the property in 1984. The property has since been inactive, except for a small portion of the facility which is leased as warehouse space to Adco Products, Inc. (Adco). Adco stores adhesive tape and packaging material at the facility. No hazardous wastes have been managed at the facility since 1984.

The facility consists of a 970,100-square-foot building on 59.1 acres in a mixed industrial and residential area. The nearest residences are located as close as 100 feet from the facility. The Grand River is approximately 0.8 mile south of the facility. Many large wetland areas surround the facility, with the closest being 0.75 mile southeast of the facility. The city of Jackson receives its water from a well field 1 mile south of the facility. The well field is upgradient of the facility, but during periods of heavy pumping, ground-water flow direction may be reversed. The nearest downgradient drinking water well, under normal pumping conditions, is located 0.68 mile north of the facility.

The PA/VSI identified the following two SWMUs and two AOCs at the facility:

### Solid Waste Management Units

1. Former Outdoor Drum Storage Pad
2. Former Indoor Drum Storage Area

### Areas of Concern

1. Former Underground Tank Farm Area
2. Polychlorinated Biphenyl (PCB)-Contaminated Transformers

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The Former Outdoor Drum Storage Pad (SWMU 1) managed 55-gallon drums containing chlorinated solvents (F001), nonchlorinated solvents (F004), thiuram (P117), and petroleum naphtha (D001). The exact date that SWMU 1 began operation is unknown, but it is possible that the area has been used for waste storage since the facility began operation in 1937. At some point in late 1980 or early 1981, all waste was moved indoors and stored at the Former Indoor Drum Storage Area (SWMU 2). Because no waste has been stored at SWMU 1 since at least 1981, the current potential for a release from SWMU 1 is low. However, the past potential for release from SWMU 1 is moderate, because the waste management practices from 1937 to 1980 are unknown. In addition, SWMU 1 had minimal secondary containment, and no sampling was conducted during RCRA-closure activities. If any releases did occur at SWMU 1, only ground water and surface soil would be impacted. Any release to air or surface water during the period of SWMU 1 operation would have since dissipated to the point where it no longer poses a threat to nearby receptors.

The current potential for a release from the Former Indoor Drum Storage Area (SWMU 2) to all environmental media is low because no waste has been stored at this SWMU since 1984. The past potential for a release to all environmental media is low because this SWMU managed waste for only 4 years, because it was located indoors with secondary containment, and because the unit has no history of documented releases.

Five underground storage tanks (UST) (AOC 1) that held fuel oil, gasoline, and deodorized gasoline on the west side of the facility were removed from the ground in 1984; these tanks, however, were left on site. During the VSI, PRC noticed that some of the tanks had small holes. It is impossible to determine if the holes were present while the tanks stored product underground. No soil or ground-water sampling was performed in the area when the tanks were removed. The past potential for a release to ground water and subsurface soils is moderate. The past potential for a release to surface water and air is low because if the tanks did leak, all contamination would be underground.

Ten PCB-Contaminated Transformers (AOC 2) were located during the VSI. Records indicate that the facility had 12 PCB-contaminated transformers and two PCB-contaminated capacitors. It is not known whether the remaining two PCB-contaminated transformers were removed from the facility or whether they remain on site, but they could not be located. Five of the transformers are located outdoors on a concrete pad with no diking. The other five transformers are located in three areas on the second floor of the facility building. The concrete around the indoor transformers was in good condition. Dark, oily stains could be seen around the bases of three of the transformers located outdoors. Staining could also be seen around one of the transformers located indoors. The potential for a release to ground water from the transformers

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is moderate. Because no surface water outlet exists in the area around the outdoor transformers and because the indoor transformers have sufficient secondary containment, the potential for a release of PCBs to surface water is low. Because PCBs do not volatilize in great volumes, the potential for a release to air is low. The potential for a release to on-site soils is high because the dark, oily stains on the concrete pad are less than 10 feet from open soil.

PRC recommends that Goodyear collect soil samples from areas near SWMU 1. These samples should be analyzed for volatile organic compounds (VOC). Because Goodyear facility representatives did not know the former locations of the USTs, soil gas sampling should be conducted in areas around AOC 1 to determine whether a release occurred. If the soil gas sampling reveals the presence of any hazardous constituents, soil sampling should be performed. Because Penmark has no plans to use the transformers in the near future, all PCB-Contaminated Transformers (AOC 2) should be properly disposed of off site. Soil and wipe sampling should be conducted around all PCB-Contaminated Transformers (AOC 2), and the samples should be analyzed for PCBs to determine the composition and extent of any leaks.

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the former Goodyear Tire & Rubber Co. (Goodyear) facility (EPA Identification No. MID 005 341 979) in Jackson, Jackson County, Michigan. The facility is now closed and currently owned by Penmark Associates, Ltd. (Penmark). The PA was completed on May 19, 1992. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. The VSI was conducted on May 20, 1992. It included interviews with Penmark representatives and a walk-through inspection of the facility. After the VSI, PRC's conversations with Joe Smerglia, Goodyear's representative, revealed that polychlorinated biphenyl (PCB)-contaminated transformers were left at the facility (Goodyear, 1992). PRC then conducted a

second VSI at the facility on September 14, 1992, to assess the condition of the PCB-Contaminated Transformers. PRC identified two SWMUs and two AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The activities of both VSIs are summarized and 11 inspection photographs are included in Attachment B. Field notes from both VSIs are included in Attachment C. A photograph from the facility's Part A permit application is included in Attachment D.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location, past and present operations, waste generating processes and waste management practices, a history of documented releases, regulatory history, environmental setting, and receptors.

### **2.1 FACILITY LOCATION**

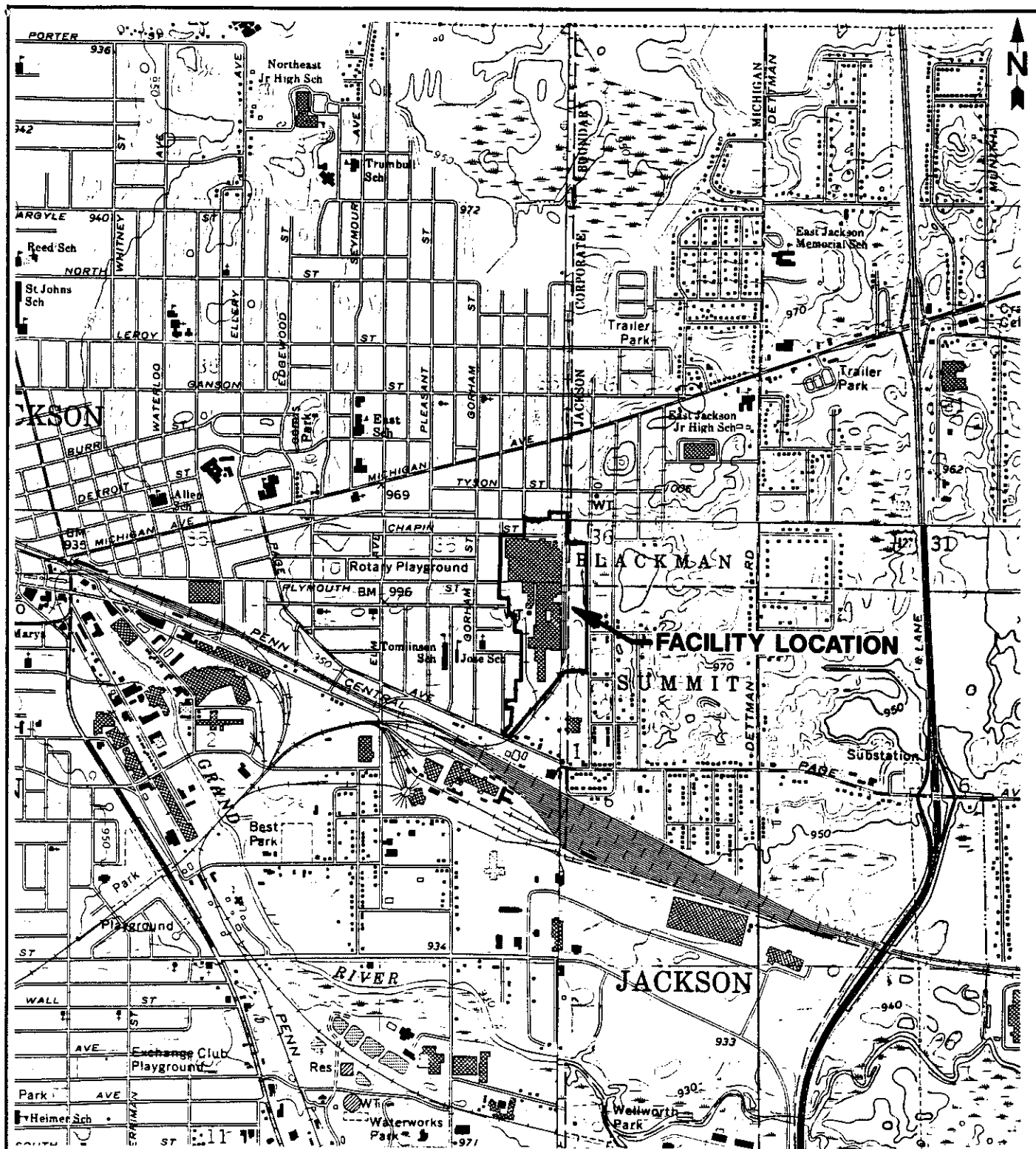
The former Goodyear facility is located at 2219 Chapin Street, Jackson, Jackson County, Michigan (latitude 42°14'47" W; longitude 84°22'35" N) . It is located in a mixed industrial and residential area of Jackson. The 59.1-acre facility is bordered on the north by residences and small businesses, on the east by vacant lots and residences, on the south by an auto salvage yard, and on the west by residences. Figure 1 displays the location of the facility.

### **2.2 FACILITY OPERATIONS**

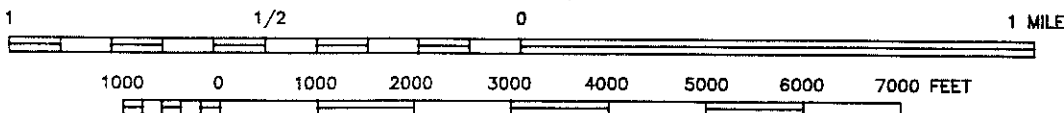
The Goodyear facility was built in the 1930s by the Kelsey-Hayes Wheel Company. Goodyear purchased the facility in 1936 and began operations in 1937. The facility building experienced periodic additions and expansions throughout its history. The facility building now occupies about 970,100 square feet. The facility employed 1,400 people when it closed in 1984.

Goodyear manufactured automobile, truck, tractor, and motorcycle tires from natural and styrene butadiene rubber. Facility operations included molding and forming the treads, sidewalls, and beads of the tire. This included binding the rubber to rayon material and impregnating the rubber with vulcanizing agents, such as carbon disulfide and thiuram, and with additives, such as antiozonators and antioxidants. The different parts and plies of the tire were then cemented together. This was done using rubber cements or by softening the rubber with petroleum naphtha. After the tire was built, it was cured or vulcanized by adding heat, which changed the rubber from a plastic material to a strong, elastic material which is tack-free, abrasion resistant, and insoluble in most solvents.

The facility stored raw materials in a number of tanks. Production oil was stored in four 15,000-gallon aboveground tanks and one 20,000-gallon aboveground tank. Fuel oil was stored in three aboveground tanks with 300,000-gallon, 120,000-gallon, and 50,000-gallon capacities. Fuel oil was also stored in a 10,000-gallon underground storage tank (UST). This fuel oil was burned to generate steam. Hydrochloric acid was stored in a 1,500-gallon aboveground tank and was used to prevent algal growth in process waters. Deodorized gasoline was stored in two 15,000-gallon USTs and used as an adhesive solvent. Gasoline was stored in a 1,000-gallon UST. All



SCALE 1:24,000



SCALE: 1" = 2,000'

JACKSON SOUTH, MICH.

NW/4 JACKSON 15' QUADRANGLE  
N4207.5—W8422.5/7.5

1971

PHOTOREVISED 1976

SOURCE: MODIFIED FROM USGS, 1971; USGS, 1976a; USGS, 1976b; USGS, 1976c



QUADRANGLE LOCATION

FORMER GOODYEAR TIRE &  
RUBBER COMPANY FACILITY  
JACKSON, MICHIGAN

**FIGURE 1**  
**FACILITY LOCATION**

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

aboveground tanks had retaining dikes. In addition, the unloading areas at each of the tanks all had catch basins with sumps. No records indicate that wastes were stored in any of the tanks. During the VSI, PRC observed five USTs that had been removed from the ground; however, these tanks have been left on site. It appears that there were two, instead of one, 1,000-gallon USTs. It is not known what the second 1,000-gallon UST held (MDNR, 1992). Goodyear facility representatives were unable to determine the exact location of the USTs (Goodyear, 1992).

From as early as 1937 to late 1980 or early 1981, wastes were stored in drums at the Former Outdoor Drum Storage Area (SWMU 1) (Goodyear, 1980b). In late 1980 or early 1981, the storage area was moved and wastes were stored at the Former Indoor Drum Storage Area (SWMU 2) (Goodyear, 1984b).

The facility was closed in early 1984 and was sold to Penmark on April 2, 1984. Most of the facility has been vacant since the property transfer, but 125,000 square feet of the facility's southern portion has been leased to Adco Products, Inc (Adco). Adco, a manufacturer of adhesive tape, uses the leased space as a warehouse and also operates a small production line. Adco does not generate any hazardous waste. Penmark has no immediate plans to sell, develop, or demolish the property.

### 2.3 WASTE GENERATION AND MANAGEMENT

Details on Goodyear's waste generation and management practices are scarce. Goodyear could not locate any records of waste generation and management practices. The facility's Part A permit application lists annual waste generation rates of 1,800 pounds of waste ring cleaner/degreaser (F001); 13,200 pounds of waste nonchlorinated solvents (F004); 1,000 pounds of thiuram (P117); and 132,500 pounds of waste petroleum naphtha (D001). The permit indicates that these wastes were stored in drums at the Former Outdoor Drum Storage Pad (SWMU 1) (Goodyear, 1980b).

The facility's Generator Biennial Hazardous Waste Report for 1983 indicates that 3,150 gallons of petroleum naphtha (D001) and 3,900 gallons of waste solvents (D001) and rubber cements (D001) were generated that year. The report also indicates that these wastes were stored in drums and disposed of by Petro-Chem Services, Inc. in Detroit, Michigan (Goodyear, 1984c). During this biennial reporting period, production at the facility was winding down, thus the waste generation rates on the biennial report may not be representative of the waste generation rates when the facility was in full operation.

Chlorinated solvents (F001) were used to clean and degrease machinery during routine maintenance. Nonchlorinated solvents (F004) were used to thin rubber cements. Thiuram or thiram (P117) was used as a vulcanizing agent. The original EPA waste code for thiuram, P117, has been de-listed and is now listed as U244 for thiram. Petroleum naphtha (D001) was used to soften the rubber before the various pieces were put together.

The facility closure plan states that the Former Outdoor Drum Storage Pad (SWMU 1) was never used for waste storage but that all waste storage was indoors at the Former Indoor Drum Storage Area (SWMU 2) (Goodyear, 1984a). However, a photograph included in the facility's Part A permit application, clearly shows wastes being stored outdoors at SWMU 1 (see Attachment D). Thus, it is reasonable to assume that SWMU 1 was used to store waste until late 1980 or early 1981, when the facility filed its Part A permit application. Sometime after the Part A was filed, the wastes were removed from SWMU 1 and stored at SWMU 2.

The facility had 12 high-voltage transformers in service during its years of operation. The transformers contained PCB-contaminated oil (EPA, 1984b). A Penmark representative stated that at least one of the 12 transformers had been removed from the facility; the representative did not know where the transformer was disposed of. The facility also maintained two high-voltage PCB-contaminated capacitors. At one point, a leak was discovered in one of the transformers. Furthermore, two 55-gallon drums of PCB-contaminated debris were noted during a 1983 PCB inspection (EPA, 1984b). It is not known where these wastes were stored. The drums were not seen during the VSI and were probably disposed of during RCRA closure. Ten PCB-Contaminated Transformers (AOC 2) were located during the VSI. . None of the ten PCB-Contaminated Transformers has been used since Goodyear vacated the facility in 1984. Adco is connected to a separate power supply (Adco, 1992).

Since the facility was sold in 1984, no RCRA-regulated hazardous wastes have been handled on site.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

A leak of PCB-contaminated transformer oil was discovered on June 11, 1981, and was

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

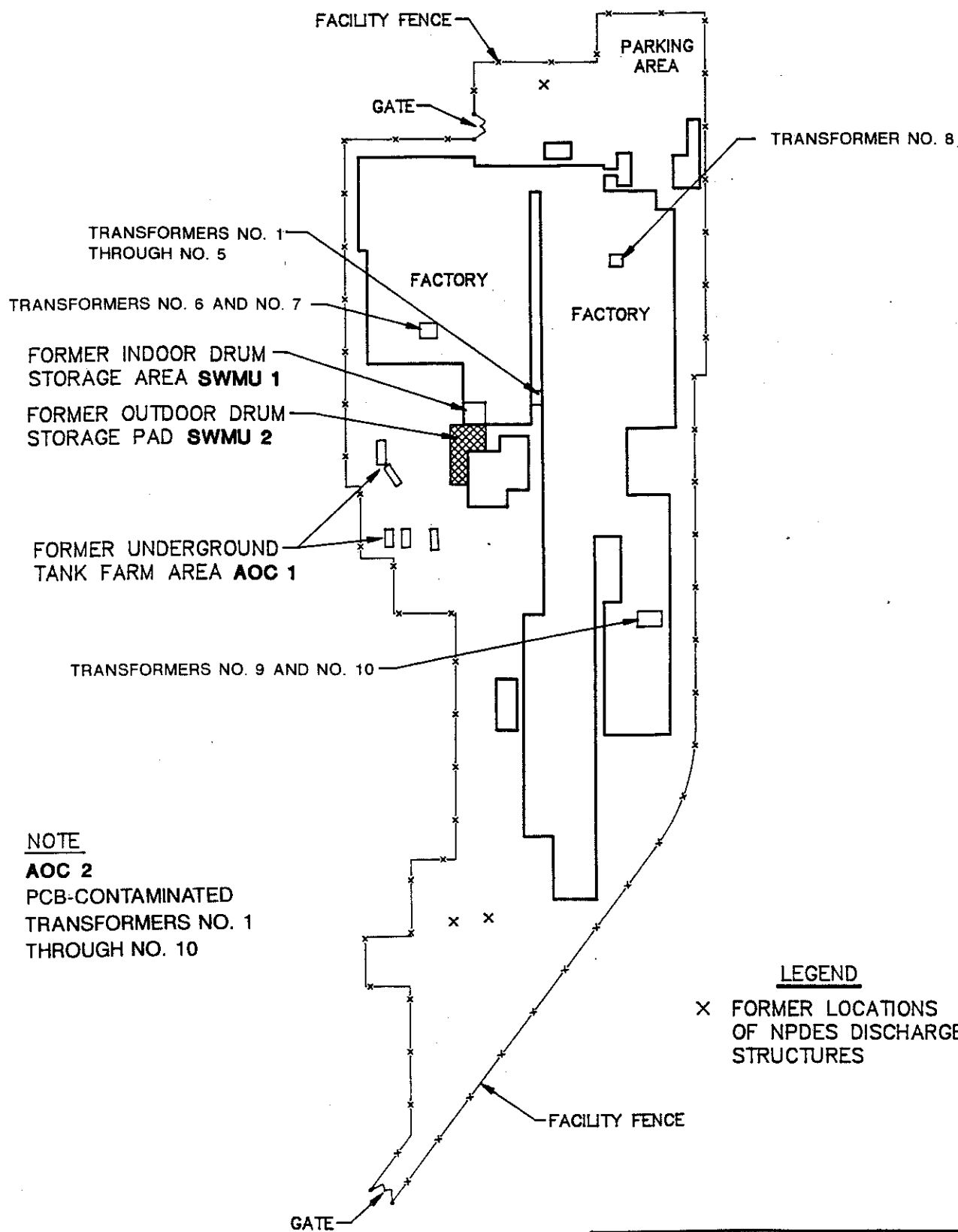
<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Former Outdoor Drum Storage Pad	Yes	Inactive; underwent RCRA closure in 1984
2	Former Indoor Drum Storage Area	Yes	Inactive; underwent RCRA closure in 1984

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Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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NOTE

**AOC 2**

PCB-CONTAMINATED  
TRANSFORMERS NO. 1  
THROUGH NO. 10

LEGEND

X FORMER LOCATIONS  
OF NPDES DISCHARGE  
STRUCTURES

FORMER GOODYEAR TIRE &  
RUBBER COMPANY FACILITY  
JACKSON, MICHIGAN

**FIGURE 2**  
**FACILITY LAYOUT**

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Chlorinated solvents/(F001)	Cleaning and degreasing production machinery	SWMU 1 and SWMU 2
Nonchlorinated solvents/(F004)	Thinning adhesives and cements	SWMU 1 and SWMU 2
Thiuram/(formerly P117, now U244)	Waste vulcanizing agent	SWMU 1 and SWMU 2
Petroleum naphtha/(D001)	Waste rubber softener	SWMU 1 and SWMU 2
Waste rubber cements/(D001)	Excess cement	SWMU 1 and SWMU 2
PCB-contaminated debris/NA <sup>a</sup>	Repair of a leaking PCB transformer	Unknown

Note:

<sup>a</sup> Denotes a non-RCRA-regulated hazardous waste

not repaired until August 20, 1981. Apparently, the leak was small and contained by a concrete floor. At the time of the 1983 PCB inspection, the transformer had been repaired and the leak had been cleaned up adequately (EPA, 1984b).

During the VSI, dark, oily stains were visible around four of the PCB-Contaminated Transformers (AOC 2). All stains appeared to be contained by either the concrete floor or concrete pad.

No other releases have been documented.

## **2.5 REGULATORY HISTORY**

Goodyear submitted a Notification of Hazardous Waste Activity on August 5, 1980 (Goodyear, 1980a). A Part A permit application was submitted on November 14, 1980 (Goodyear, 1980b). The application lists 1,500 gallons of container storage (SO1) in a proposed drum storage area. The application also listed annual generation rates of 1,000 pounds of chlorinated solvents (F001); 13,200 pounds of nonchlorinated solvents (F004); 1,000 pounds of thiuram (P117); and 132,500 pounds of petroleum naphtha (D001) (Goodyear, 1980b).

A 1982 MDNR inspection cited four paperwork violations (MDNR, 1982). A subsequent MDNR inspection in 1983 revealed no violations (MDNR, 1983). In 1983, an EPA polychlorinated biphenyl (PCB) inspection found that the facility maintained two 55-gallon drums of PCB-contaminated debris, 12 PCB transformers in service, and two PCB capacitors in service. The inspection found that one of the drums, one of the transformers, and neither of the capacitors were properly marked with a PCB label. The facility also failed to maintain inspection records for some of the units. In addition, the facility failed to repair a leak from a PCB transformer within 2 business days. The leak occurred on June 11, 1981 and was not repaired until August 20, 1981 (EPA, 1984b).

In early 1984, after the facility was sold, Goodyear requested a withdrawal of the Part A permit application. Goodyear stated that the Former Outdoor Drum Storage Pad (SWMU 1), as listed in the Part A permit application, was never used. Instead, Goodyear claimed that all hazardous waste was stored indoors at the Former Indoor Drum Storage Area (SWMU 2). SWMU 2 went through RCRA-closure on March 30, 1984, and exhibited no sign of contamination (Goodyear, 1984a). EPA requested a copy of the closure plan, which Goodyear submitted on May 4, 1984 (Goodyear, 1984b). EPA approved the closure plan on July 26, 1984 (EPA, 1984a). By approving closure of the entire facility, closure of SWMU 1 was approved.

In September of 1984, EPA issued a Complaint and Notice of Opportunity for Hearing for improper marking, improper recordkeeping, and improper use of PCBs. This action resulted from violations discovered during the 1983 PCB inspection. The fines for these violations totalled \$6,700 (EPA 1984b).

The facility held one National Pollutant Discharge Elimination System (NPDES) permit for three discharge structures. NPDES permit No. MI0001899 allowed Goodyear to discharge noncontact cooling water to an on-site ditch. The ditch drains to an underground aqueduct which empties into the Grand River. No violations of this permit have been documented. When the facility ceased operations, the permit was allowed to expire.

The facility also held two MDNR air permits, No. 175-72 and No. 213-73. These permits allowed Goodyear to release hydrocarbon. No violations have been documented, and both permits were allowed to expire after the facility closed.

## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

### **2.6.1 Climate**

Climate data for Jackson County was not available. However, climate data for Lansing, Michigan, about 35 miles north of Jackson, should approximate the climate in Jackson. The average daily temperature of this location is 47.2°F. The lowest average daily temperature is 21.6°F in January. The highest average daily temperature is 70.8°F in July (NOAA, 1990).

The total annual precipitation for the county is about 30 inches. The mean annual lake evaporation is also about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is between 2.0 and 2.5 inches (USDC, 1963).

The prevailing wind is from the southwest at an average speed of 10 miles per hour (NOAA, 1990).

### **2.6.2 Flood Plain and Surface Water**

The Goodyear facility is not located in a 100-year flood plain (FEMA, 1980). The facility grounds are fairly level. Drainage is to the south via an on-site drainage ditch. It is not

known where this drainage ditch flows, but it is presumed to continue south via an underground aqueduct into the Grand River. The Grand River is the nearest surface water body. It flows from southeast to northwest and is located as close as 0.8 mile south of the facility (USGS, 1976c).

Numerous wetland areas occupy the land surrounding Jackson. The nearest wetland area is about 0.75 mile southeast of the facility and is about 30 acres. A 100-acre wetland area lies about 0.8 mile north of the facility. Several other large wetland areas lie within a 2-mile radius of the facility to the north, east, and south (USGS, 1971; USGS, 1976a; USGS, 1976b; USGS, 1976c).

An unnamed pond lies about 1.25 miles east of the facility. Round Lake is about 2.5 miles to the southeast, and Gillets Lake is about 3 miles northeast of the facility (USGS, 1971; USGS, 1976a; USGS, 1976b; USGS, 1976c).

### **2.6.3            Geology and Soils**

Site specific geological information could not be obtained for the Goodyear facility. However, regional geological was obtained from area well logs. Glacial outwash, consisting of sand, clay, and gravel from the Wisconsin age extends downward to about 40 feet below ground surface (bgs). The till is underlain by a layer of Upper Mississippian Michigan Shale that reaches to 75 feet bgs. The Lower Mississippian Marshall Formation, which consists of sandstone with varying amounts of shale, is from 75 feet to 380 feet bgs. A shale layer of unknown thickness is 380 feet bgs (Everett, 1992; FTCHI, 1988).

### **2.6.4            Ground Water**

Regionally, the surficial deposits yield small amounts of ground water and are known to be horizontally and laterally discontinuous in many areas. For these reasons, the surficial deposits are not typically used as a source of ground water in the area (FTCHI, 1988).

The Marshall Sandstone is the major source of ground water in the area. It is confined above by the Michigan Shale and cohesive soils in the surficial deposits. Ground-water flow in the Marshall Sandstone is to the north. However, regional pumping during periods of high demand may slow or even reverse the direction of flow. The recent addition of four new municipal wells further away from the Goodyear facility has diminished the effect of municipal pumping on ground-water flow (Everett, 1992).

The facility occupies about 59 acres in a mixed-use area in Jackson, Michigan. Jackson has a population of about 37,500 (Rand McNally, 1992).

The facility is bordered on the north by residences and small businesses, on the east by vacant lots and residences, on the south by a scrap metal yard, and on the west by residences. The nearest residences are located about 100 feet from the west side of the facility. The Tomlinson School and the Jose School are both located about 1,000 feet west of the facility (USGS, 1971; USGS, 1976a; USGS, 1976b; USGS, 1976c). The facility is completely surrounded by a 6-foot-high chain-link fence topped with three strands of barbed wire and locked gates. The facility grounds are also patrolled by a caretaker and a several of dogs. However, empty beer bottles, graffiti, and smashed windows indicate that people have gained access to the site.

The city of Jackson obtains its drinking water from 12 wells located about 1 mile southwest of the facility on East Mansion Street. These wells are screened in the Marshall Sandstone and also supply drinking water for part of Leoni Township and all of Blackman Township. Low levels of VOC in these wells have prompted the City of Jackson to drill four new wells 2 miles southwest of the facility near Elmdale Drive. These wells are also screened in the Marshall Sandstone. The city of Jackson also owns a share of the Ella Sharp Park Golf Course well, which is used as a backup well. This well is located 2.75 miles southwest of the Goodyear facility (City of Jackson, 1991; Everett, 1992).

The nearest private drinking water well is located about 3,500 feet north of the facility at 503 Bates St. It is the only downgradient well within 2 miles of the facility. Another private well is located 800 feet north of the facility at 2502 Michigan Ave. NE, but it is no longer used. Several other private drinking water and industrial wells are located about 3,100 feet south of the facility (City of Jackson, 1991).

No sensitive environments are located on site. A 30-acre wetland area is located 0.75 mile to the southeast and a 100-acre wetland area is located 0.8 mile to the north. The Grand River flows as close as 0.8 mile south of the facility (USGS, 1971; USGS, 1976a; USGS, 1976b; USGS, 1976c). It is used only for recreation. Storm sewers from the facility may drain into the Grand River.

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1      Former Outdoor Drum Storage Pad**

**Unit Description:** The unit consists of a 6-foot by 30-foot concrete pad on the western side of the facility building (see Photograph No. 1). The pad was listed on the facility's Part A permit application as the only SWMU at the facility (Goodyear, 1980b). Though the facility's closure plan states that the area was never used for drum storage, a photograph submitted with the facility's Part A permit application shows wastes being stored at SWMU 1 on November 10, 1980 (see Attachment D).

**Date of Startup:** Goodyear facility representatives did not know the date of startup for SWMU 1. It is probable that this pad or a similar pad has been used as a drum storage area since facility operations began in 1937.

**Date of Closure:** At some time, probably late 1980 or early 1981, all wastes were moved indoors to the Former Indoor Drum Storage Area (SWMU 2). The facility's closure plan incorrectly states that wastes were never stored at SWMU 1. Thus, SWMU 1 never underwent formal RCRA-closure procedures. No soil samples from SWMU 1 were collected. However, EPA approved closure of the entire facility in 1984, which includes SWMU 1 (EPA, 1984a).

**Wastes Managed:** This SWMU managed 55-gallon drums of waste chlorinated solvents (F001), nonchlorinated solvents (F004), thiuram (P117), and petroleum naphtha (D001) (Goodyear, 1980b).

**Release Controls:** The pad is constructed of concrete. It is not known if the pad was sealed. No curbs or dikes were visible during the VSI. Drains were visible during the VSI. At the time of the VSI, the drains were clogged with grit. Facility representatives could not determine the outlet of the drains, if any. Inspection of Photograph No. 1 in Attachment D reveals the wastes were

determine the outlet of the drains, if any. Inspection of Photograph No. 1 in Attachment D reveals the wastes were stored in 55-gallon drums on wooden pallets. The pallets were placed on a concrete pad. No curbs or dikes are visible in the picture.

**History of  
Documented Releases:**

This unit has no history of documented releases. However, because this SWMU has probably been operational since 1937, it is possible that releases have occurred but no documentation could be located. No soil or ground-water samples were collected as part of the closure.

**Observations:**

The pad was covered with rusted debris. There was no sign of any waste still being stored on site. No odors were detected. A sign was posted reading, "No smoking within 50 feet - inflammable solvents." The concrete area appeared to be larger than 6-feet by 30-feet. PRC estimated the area to be about 20-feet by 60-feet.

**SWMU 2**

**Former Indoor Drum Storage Area**

**Unit Description:**

The facility closure plan only states that wastes were stored in Building 6D. A photograph submitted with the closure plan shows that SWMU 2 was in the corner of Building 6D. The photograph shows an approximate 30-foot by 30-foot section of the room. It is not known if a larger portion of the room was used for waste storage.

**Date of Startup:**

The unit probably began operation in late 1980 or early 1981, when wastes were moved indoors from the Former Outdoor Drum Storage Pad (SWMU 1).

**Date of Closure:**

This SWMU underwent RCRA closure in 1984 and has not managed solid waste since.

**Wastes Managed:**

The unit probably managed the same wastes as the Former Outdoor Drum Storage Pad (SWMU 1): 55-gallon drums of waste chlorinated solvents (F001), nonchlorinated solvents (F004), thiuram (P117), and petroleum naphtha (D001) (Goodyear, 1980b).

**Release Controls:**

The unit was located indoors with a concrete floor. The walls of the room form a moderate amount of secondary containment.

**History of  
Documented Releases:**

There is no history of documented releases at this SWMU. However, details on the waste management practices at this SWMU are scarce. In addition, no soil or ground-water sampling was conducted as part of the closure procedures.

**Observations:**

SWMU 2 was cluttered with rusted steel debris. There was no sign of any waste remaining at the SWMU. No odors were detected. The floor had a few small cracks.

#### **4.0 AREAS OF CONCERN**

PRC identified two AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

##### **AOC 1 Former Underground Tank Farm Area**

Facility records indicate that four USTs existed at the facility. Two 15,000-gallon USTs contained deodorized gasoline. There was also a 10,000-gallon fuel oil UST and a 1,000-gallon gasoline tank (MDNR, 1992). During the VSI, five tanks were observed (see Photographs No. 2 and No. 3). The sizes appeared to match the sizes in the facility records. The fifth tank appeared to have a 1,000-gallon capacity. Penmark representatives stated that the tanks had been removed at the time Penmark bought the property in 1984. The tanks appeared to be in good condition, considering that they were pulled and have been left aboveground since at least 1984. Small holes were evident in some of the tanks. It is impossible to know if the tanks had holes while they stored raw material, if the tanks were damaged when they were removed, or if the tanks had rusted while aboveground. Goodyear has no record of the tank removals in its files. However, the facility closure plan stated that all tanks were flushed, vented, and had all sludges removed (Goodyear, 1984b). Goodyear facility representatives were unable to locate information concerning the former locations of the USTs (Goodyear, 1992).

##### **AOC 2 PCB-Contaminated Transformers**

Ten PCB-Contaminated Transformers were inspected during the VSI. For convenience, PRC has arbitrarily labeled the units Transformers No. 1 through No. 10. The approximate locations of the units are shown in Figure 2. Transformers No. 1 through No. 5 are located outdoors on a concrete pad (see Photographs No. 4 and No. 5). All five of these transformers were marked with yellow caution stickers stating that the transformers contained oil with 50 to 499 parts per million PCBs. Three other transformers were located on the same pad, but these units had blue stickers stating that PCBs were not present in the transformer oil. Because none of the outdoor transformers had oil level indicators, PRC could not determine whether oil remained in the transformers. Dark, oily stains were present around the bases of Transformers No. 2, No. 3, and No. 5 (see Photographs No. 4 and No. 6). The concrete pad was not diked. The concrete was

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cracked in several areas. Bare ground is present about 10 feet from the transformers. The manufacturer's labels on the units were corroded and could not be read.

PCB-Contaminated Transformers No. 6 and No. 7 were located on the second floor of the west side of the facility building (see Photographs No. 7 and No. 8). These units were located on concrete flooring with no cracks. A valve was located near the base of each unit. A pan of oil dry was located beneath the valve of each unit. No stains or leaks were visible around either of the units. A liquid level indicator on Transformer No. 7 showed that the unit was one-third to one-half full of transformer fluid. Because the transformers have not been used since 1984, the accuracy of the indicator is questionable.

Transformer No. 8 was suspended from the ceiling indoors on the eastern side of the facility building. The unit rested on a steel and wood platform (see Photograph No. 9). No leakage was detected on the underside of the platform. Cracks were evident in the concrete of the first floor below the transformer platform.

Transformers No. 9 and No. 10 were located on the second floor of the eastern side of the facility building. No cracks were visible in the concrete flooring. Each transformer had a valve near the bottom of the unit. A small pan of oil dry had been placed below the valve of each unit. Dark, oily stains were present on the floor around the pan at Transformer No. 10; the oil dry in the pan also appeared oily and discolored. The liquid level indicators on both units indicated that the transformers were about one-half full. Manufacturer's labels indicated that each transformer had an oil capacity of 330 gallons.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and two AOCs at the former Goodyear facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

### **SWMU 1                      Former Outdoor Drum Storage Pad**

**Conclusions:**                      Because no waste has been stored at this SWMU since 1980, the current potential for a release to all environmental media is low. However, little is known about the waste management practices at SWMU 1. The SWMU had no secondary containment except for some drains. Although there is no documented history of release, it is possible that releases occurred at this SWMU between 1937 and 1980 and were not documented. The past potential for a release to all environmental media is moderate. However, only ground-water and on-site soils would still be contaminated if a release had occurred.

**Recommendations:**              PRC recommends that Goodyear collect soil samples from the area around the concrete pad. The samples should be analyzed for VOCs.

### **SWMU 2                      Former Indoor Drum Storage Area**

**Conclusions:**                      No waste has been stored at this SWMU since 1984, thus the current potential for a release to all environmental media is low.

Little is known about the past waste management practices at SWMU 2. The unit has no history of documented releases. The waste was stored indoors on a concrete floor with walls providing some secondary containment. In addition, SWMU 2 only handled wastes from 1980 to 1984. The past potential for a release to all environmental media is low.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**AOC 1 Former Underground Tank Farm Area**

**Conclusions:** This area had at least five USTs that contained fuel oil, deodorized gasoline, and gasoline. All tanks had sludges removed, and were then flushed, vented, and removed from the ground. No soil or ground-water sampling was performed. Some of the tanks had small holes at the time of the VSI. It is impossible to tell if the holes were present while the tanks were in service. Goodyear facility representatives were unable to determine the former locations of the USTs (Goodyear, 1992).

**Recommendations:** Because the exact former locations of the five USTs are unknown, PRC recommends soil gas sampling for VOCs at AOC 1. If the soil gas sampling indicates any areas of VOC contamination, more extensive soil and ground-water sampling may be necessary.

**AOC 2 PCB-Contaminated Transformers**

**Conclusions:** Ten PCB-Contaminated Transformers were identified at the facility. Dark, oily stains were present on the concrete around the bases of Transformers No. 2, No. 3, No. 5, and No. 10. The five transformers located outdoors are especially susceptible to further corrosion and leakage. The transformers located outdoors are only 10 feet from bare ground. No diking exists around the concrete pad. Thus, the potential for a release to ground water from the PCB-Contaminated Transformers is moderate. The bare ground near the outdoor PCB-Contaminated Transformers is surrounded by concrete, and no conduit for runoff to surface water exists. Thus, the potential for a release to surface water is low. The potential for a release to air from the PCB-Contaminated Transformers is low because PCBs have a high vapor pressure and are unlikely to volatilize in large volumes. The potential for a release to on-site soils from the outdoor PCB-Contaminated Transformers is high because stains are apparent on the concrete pad. In addition, bare ground is less than 10 feet from the units.

**Recommendations:** PRC recommends that Penmark properly dispose of all PCB-Contaminated Transformers. Because none of the transformers has been used since 1984 and because Penmark has no plans to use the transformers in the future,

RELEASED  
DATE 2/18/99  
RIN #  
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

RELEASED  
DATE 2/11/99  
RIN #           
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

Penmark should properly dispose of them. In addition, wipe and soil samples should be collected around the bases of all PCB-Contaminated Transformers to determine the extent of any PCB-contaminated transformer oil leakage.

RELEASED 2/18/99  
 DATE \_\_\_\_\_  
 RIN # \_\_\_\_\_  
 INITIALS WV

ENFORCEMENT  
 CONFIDENTIAL

**TABLE 3**  
**SWMU AND AOC SUMMARY**

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Outdoor Drum Storage Pad	1937 to 1980	None	PRC recommends that Goodyear conduct soil sampling around the pad. These soil samples should be analyzed for VOCs.
2. Former Indoor Drum Storage Area	1980 to 1984	None	PRC recommends no further action
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Underground Tank Farm Area	Unknown to 1984 or 1985	Small holes are present in some of the tanks. It is not known if the holes were present while the tanks were in service.	Because the former locations of the USTs are not known, PRC recommends that soil gas sampling be performed around AOC 1. If the soil gas sampling reveals any VOC contamination, soil sampling should be conducted.
2. PCB-Contaminated Transformers	Unknown to present	Dark, oily stains present around the bases of four transformers	PRC recommends that Penmark properly dispose of all PCB-Contaminated Transformers. Samples should be collected to determine the composition and extent of any leakage.

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USGS, 1976a. Photoinspected 7.5-Minute Topographical Map, Gillets Lake, Michigan Quadrangle.

USGS, 1976b. Photorevised 7.5-Minute Topographical Map, Jackson North, Michigan Quadrangle.

USGS, 1976c. Photorevised 7.5-Minute Topographical Map, Jackson South, Michigan Quadrangle.

**ATTACHMENT A**  
**EPA PRELIMINARY ASSESSMENT FORM 2070-12**



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE MI 02 SITE NUMBER MTD 005 341 979

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Former Goodyear Tire & Rubber Company Facility (Currently owned by Penmark Associates, Ltd.)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 2219 Chapin Street				
03 CITY Jackson	04 STATE MI	05 ZIP CODE 49204	06 COUNTY Jackson	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 42°14'47 W		LONGITUDE 84°22'35" N			
10 DIRECTIONS TO SITE (Starting from nearest public road) Turn south from E. Michigan Avenue onto Forbes Street and go two blocks. Facility is at intersection of Forbes Street and Chapin Street.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Penmark Associates, Ltd.	02 STREET (Business, mailing residential) 1000 W. North Avenue				
03 CITY Chicago	04 STATE IL	05 ZIP CODE 60622	06 TELEPHONE NUMBER (312) 664-6300		
07 OPERATOR (if known and different from owner) Formerly Goodyear Tire & Rubber Company	08 STREET (Business, mailing, residential)				
09 CITY Akron	10 STATE OH	11 ZIP CODE 44316	12 TELEPHONE NUMBER (216) 796-7898		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 08 / 15 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

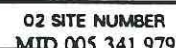
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 9/14/92 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc.			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1937   1984 <input type="checkbox"/> UNKNOWN BEGINNING YEAR ENDING YEAR			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Five underground storage tanks (UST) were removed in 1984 without any sampling. In addition, two drum storage areas were RCRA-closed in 1984 without any sampling. There is a possibility of on-site soils or ground-water contamination by fuel oil, gasoline, and D001, F001, and F004 wastes. Ten PCB-contaminated transformers still remain on site.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Possible residual on-site soils and ground-water contamination from the five USTs and former outdoor drum storage area. No hazardous waste remains on site. Four of the PCB-contaminated transformers have dark, oily stains around their bases.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
--	--	--	--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT David Berestka	05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (312) 856-8700	08 DATE 09 / 14 / 92 MONTH DAY YEAR



<input type="checkbox"/> A. TOXIC	<input type="checkbox"/> H. IGNITABLE
<input type="checkbox"/> B. CORROSIVE	<input type="checkbox"/> I. HIGHLY VOLATILE
<input type="checkbox"/> C. RADIOACTIVE	<input type="checkbox"/> J. EXPLOSIVE
<input type="checkbox"/> D. PERSISTENT	<input type="checkbox"/> K. REACTIVE
<input type="checkbox"/> E. SOLUBLE	<input type="checkbox"/> L. INCOMPATIBLE
<input type="checkbox"/> F. INFECTIOUS	<input type="checkbox"/> M. NOT APPLICABLE
<input type="checkbox"/> G. INFLAMMABLE	



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE  
MT

02 SITE NUMBER  
MTD 005 341 979

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Small amounts of PCB-contaminated transformer oil may migrate from stains on concrete pad and contaminated ground water.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION  
(Acres)

Outdoor concrete pad has dark, oily stains, which may contain PCBs; bare ground is less than 10 feet from stains. Small amounts of PCB-contaminated transformer oil may contaminate soil.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Facility employs one caretaker who may come in contact with PCB-contaminated transformer oil.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE  
MT

02 SITE NUMBER  
MTD 005 341 979

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

None observed

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

Several dogs live in the facility buildings. Dogs may come into contact with PCB-contaminated transformers, indicating unstable containment of hazardous substances.

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

None observed

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE: \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

None observed

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

None observed

01 ☐ O. CONTAMINATION OF SEWERS, DRAINS, WWTPS  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

No observed

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

None observed

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

PRC Environmental Management, Inc. (PRC), 1992. Visual Site Inspection of the Former Goodyear Tire & Rubber Facility in Jackson, Michigan, September 14.



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE  
MT

02 SITE NUMBER  
MTD 005 341 979

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Small amounts of PCB-contaminated transformer oil may migrate from stains on concrete pad and contaminated ground water.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION  
(Acres)

Outdoor concrete pad has dark, oily stains, which may contain PCBs; bare ground is less than 10 feet from stains. Small amounts of PCB-contaminated transformer oil may contaminate soil.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

Facility employs one caretaker who may come in contact with PCB-contaminated transformer oil.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

None observed

**ATTACHMENT B**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**

## **VISUAL SITE INSPECTION SUMMARY**

**Former Goodyear Tire & Rubber Co.**  
2219 Chapin Street  
Jackson, Michigan  
MID 005 341 979

### **First Facility Visit**

**Date:** May 20, 1992

**Primary Facility Representative:** Morton Skolnik, Penmark Associates Ltd. (Penmark),  
**Representative Telephone No.:** 312/664-6300

**Additional Facility Representatives:** James A. Kinsey, Project Director, Roy F. Weston, Inc.,  
Consultant to Penmark  
Richard Malechinski, Facility Caretaker

**Inspection Team:** David Berestka, PRC Environmental Management, Inc.  
Mary Wojciechowski, PRC  
Martin Jacobson, Michigan Department of Natural Resources

**Photographer:** David Berestka, PRC

**Weather Conditions:** Calm, sunny, 60°F

**Summary of Activities:** The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Penmark representatives then discussed the facility's past and current operations. Because the facility has been closed since 1984 and is under new ownership, most questions about Goodyear Tire & Rubber Company (Goodyear) operations could not be answered during the VSI.

The VSI tour began at 10:45 a.m. The Former Outdoor Drum Storage Pad (SWMU 1) and the Former Indoor Drum Storage Area (SWMU 2) were inspected, along with the Former Underground Tank Farm Area (AOC 1). PRC did not actually enter SWMU 2, but rather inspected the room through the broken windows. No wastes were visible. Some small holes were noted in some of the USTs at AOC 1. PRC noted that the entire facility has deteriorated badly since its closure.

The tour concluded at 11:10 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:15 a.m.

## **Second Facility Visit**

**Note:**

After the first facility visit, PRC learned that polychlorinated biphenyl (PCB)-Contaminated Transformers (AOC 2) had been left at the facility through telephone conversations with Joe Smerglia, a Goodyear representative (Goodyear, 1992). Thus, a return trip to the facility was arranged to assess the condition of the transformers.

**Date:**

September 14, 1992

**Facility Representative:**

James A. Kinsey, Project Director, Roy F. Weston, Inc.,  
Consultant to Penmark  
Richard Malechinski, Facility Caretaker

**Inspection Team:**

David Berestka, PRC

**Photographer:**

David Berestka, PRC

**Weather Conditions:**

Calm, sunny, 70°F

**Summary of Activities:**

The second VSI began at 3:00 p.m. PRC explained that the purpose of the second VSI, was to assess the condition of the PCB-Contaminated Transformers (AOC 2). At about 3:05 p.m., Mr. Malechinski led PRC around the facility to inspect 10 PCB-Contaminated transformers. Dark, oily stains were present around the bases of four of the units. PRC could not determine the exact composition or the exact sources of the stains, but the sources of all four stains appeared to be the PCB-Contaminated Transformers. The tour concluded at 4:00 p.m.



**Photograph No. 1**

**Orientation:** North

**Description:** SWMU 1 is the concrete pad in the foreground. A drain is visible near the grass on the left. SWMU 2 was in the corner of the building in the background.

**Location:** SWMU 1 and SWMU 2

**Date:** May 20, 1992



**Photograph No. 2**

**Orientation:** Southwest

**Description:** The rust-colored tank on the left is believed to be the 10,000-gallon fuel oil UST. The two tanks on the right are believed to be 1,000-gallon USTs, one of which probably held gasoline. The white tank in the background is a 300,000-gallon fuel oil storage tank. The dark gray patches in the foreground and on the hill may be areas of stressed vegetation.

**Location:** AOC 1

**Date:** May 20, 1992



**Photograph No. 3**

**Orientation:** Northwest

**Description:** The two tanks in this picture are probably the two 15,000-gallon deodorized gasoline USTs.

**Location:** AOC 1

**Date:** May 20, 1992



**Photograph No. 4**

**Orientation:** Southwest

**Description:** This picture shows Transformers No. 1, No. 2, No. 3, and No. 4, from left to right. The yellow stickers on the sides of the units indicate that the transformer oil is contaminated with PCBs. Dark, oily stains can be seen near the bases of Transformers No. 2 and No. 3.

**Location:** AOC 2

**Date:** September 14, 1992

Photograph No. 5  
Location: AOC 2  
Orientation: Northwest  
Date: September 14, 1992  
Description: This photograph shows Transformer No. 5. A yellow label indicating that the unit contains PCB-contaminated oil is on the back side of the unit. A dark oily stain can be seen around the base of the transformer.



Photograph No. 6  
Orientation: South  
Date: September 14, 1992  
Description: This photograph shows the stain around the base of Transformer No. 5.



**Photograph No. 7**  
**Orientation:** Northwest  
**Description:** This photograph shows Transformer No. 6.

**Location:** AOC 2  
**Date:** September 14, 1992



**Photograph No. 8**  
**Orientation:** North  
**Description:** This photograph shows Transformer No. 7. The upper, left gauge is the liquid level indicator.

**Location:** AOC 2  
**Date:** September 14, 1992



Photograph No. 9  
 Orientation: West  
 Description: This photograph shows Transformer No. 8.

Location: AOC 2  
 Date: September 14, 1992



Photograph No. 10  
 Orientation: West  
 Description: This photograph shows Transformer No. 9.

Location: AOC 2  
 Date: September 14, 1992



Photograph No. 11

Orientation: Southeast

Location: AOC 2

Date: September 14, 1992

Description: This photograph shows Transformer No. 10. Dark, oily stains can be seen in and around the pan of oil dry at the base of the unit.

**ATTACHMENT C**  
**VISUAL SITE INSPECTION FIELD NOTES**

(14)

(15)

Goodyear Tire & Rubber  
May 20, 1992  
10<sup>00</sup> Am

mw 5/10/92

(16)

Port Security - Benmark Ind

Jim Lindsey - Winston

Mark Jacobson - MNP

Richard Markachuk - Trelatka

Benmark has owned Property

Since ~ 84 or 85

Currently rents out portion  
of property as warehouse  
space for storage of  
adhesives

acres ~ 75

(17)

1 3 Tires possibly former use  
area

2 Possible storage area, "instrument  
shed" sign  
North

3 3 Tires possibly former use  
Northwest

4 Possible storage area, concrete  
bed near building, door  
North

(18)

City well fields

1 w/ 12 wells - operational

SW of fac. 1.54

installed in 1920s

1 w/ 4 wells - under construction

SW of fac. 1.54

1 well on site, not used

since city supplied water

low levels of VOCs

in current well field

GW flow primarily to North

140 E Mansions St

Water Plank

(19)

(20)

(21)

Gerrard McGraw  
Assembly Division  
PA - VSI  
May 21, 1992

MMW

(32) GOODYEAR PA/UST

RE-INSPECTION

SEPTEMBER 14, 1992

3:00 pm

Jackson, Michigan

70°F, Sunny, Calm

DAVID BERESTKA, PRC

Rich Molechinski - Building

caretaker for Penmark

Jim Kinsey, Roy E. Weston

looking for PCB transformers

2nd floor - west side of building

Westinghouse Inerteen Transformer

GE Pyramol Transformer

No leaks from either transformer

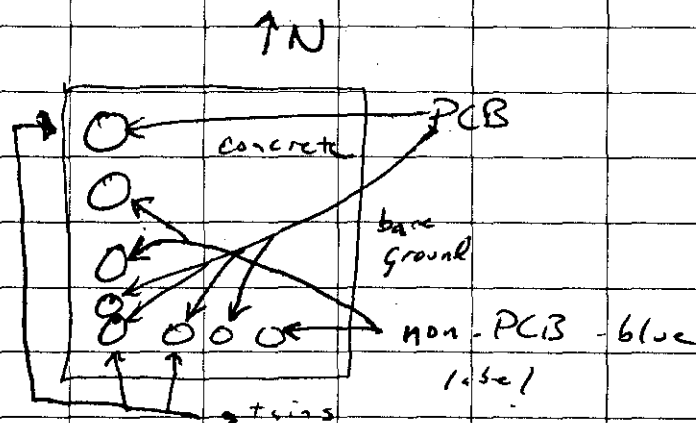
No cracks in concrete floor

DDO #1412

(33)

liquid level indicator  
on GE transformer indicated  
unit was half full.

Outdoor transformers



locks or at least dark

stains around 3 transformers

all yellow labels state

50-499 ppm PCBs

Concrete cracked in places

DDO #1412

(34)

On Eastern side of building. PCB transformer on wooden platform suspended from the ceiling. Hanging ladder did not look sturdy. PRC did not climb up. No staining apparent on underside of wooden floor.

On southwest side of building - 2nd floor  
2 transformers West transformer OK - no leaks no cracks in floor - PCB label

East transformer PCB labels  
Oil dry in pan below  
PCB 12/14/92

(35)

Spigot visibly stained  
stains all around pan  
Stains appear to emanate from transformer unit.  
Mr. Kinsey claimed that stains were from a leak in roof. Stains appeared to be too localized to be results of a roof leak.

Facility was still littered with debris, old machinery, fork lifts, etc. Paint chips cover the floor.  
Many Pigeons in hutch.  
The facility - EMPaint cans & empty drums in several places. Several dogs also

PCB 12/14/92

(36)

live at the facility

Beer bottles & some  
graffi was seen on  
the building walls

Mr. Polechinski located  
the approximate location  
of the above-mentioned  
PCB-contaminated Transformers  
on a map supplied by  
PRL.

PRL left the facility  
@ 4:00 pm

~~P-AB~~

DSB 11/4/92

11/4/92

1:30 pm.

(37)

Kirkwood Industries

cloudy, 40°F

Clarence Tople, Kirkwood

Dwight Berestka, PRL

Ron Baker, PRL

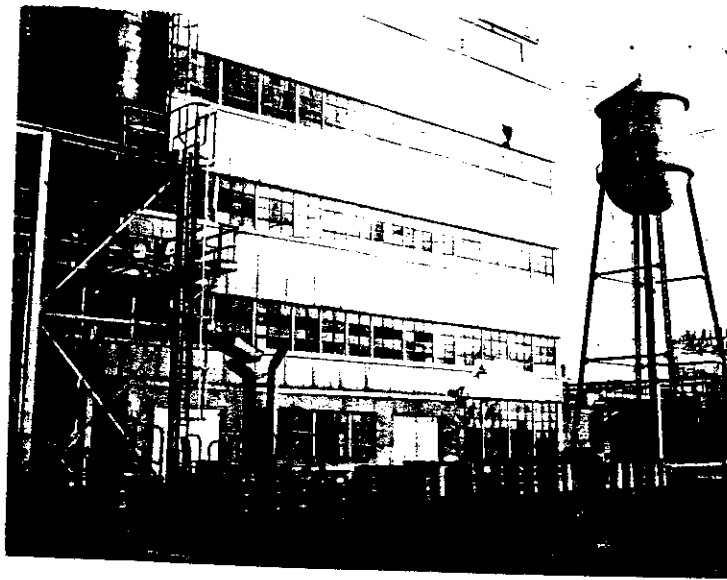
inspect Former Hazardous Waste  
Storage area (SUMU 3)

In Garage, on concrete floor,  
Not sealed or painted, some  
minor (< 1 foot in length) cracks  
in concrete. No diking. Wooden  
Wall of garage would provide only  
minimal secondary containment.  
Area holds only product now.  
Waste was stored 2 drums widths  
from wall. No evidence of release

~~P-AB~~  
11/4/92

11/11

**ATTACHMENT D**  
**PART A PERMIT APPLICATION PHOTOGRAPH**



11/10/80

- Drum Storage Area

# **CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE**

10  
 RELEASED  
 DATE 2/10/99  
 RIN # \_\_\_\_\_  
 INITIALS mv

Completed by: Rick Hersemann  
 Date: September 21, 1992

**ENFORCEMENT  
CONFIDENTIAL**

## **Background Facility Information**

Facility Name: Goodyear Tire & Rubber Company  
 EPA Identification No.: MID 005 341 979  
 Location (City, State): Jackson, MI  
 Facility Priority Rank: Moderate

RECEIVED  
 WMD RECORD CENTER  
 OCT 13 1995

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

The entire facility, which includes 2 SWMUs and 2 AOCs.

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## **Status of Corrective Action Activities at the Facility**

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)
- ☒ RCRA Facility Assessment (RFA) or equivalent completed
- ☐ RCRA Facility Investigation (RFI) underway
- ☐ RFI completed
- ☐ Corrective Measures Study (CMS) completed
- ☐ Corrective Measures Implementation (CMI) begun or completed
- ☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
- ☐ Post-closure permit
- ☐ Enforcement order
- ☒ Other (Explain)

No corrective action activities have been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
- ☐ No
- ☐ Uncertain; still underway
- ☒ Not required

Additional explanatory notes:

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## Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

☒ Ground water  
☐ Surface water  
☐ Air  
☒ Soils

6. Are contaminant releases migrating off-site?

☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

☐ No  
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

☐ Yes (Go to 8a)  
☐ No  
☒ Uncertain

Additional explanatory notes:

Caretaker at facility could be exposed to polychlorinated biphenyls (PCB) in transformers.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

No sampling data is available to determine if ground water is contaminated.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

☐ Yes (Go to 9)  
☐ No  
☒ Uncertain

Additional explanatory notes:

Potential exists for ground water to be contaminated. No sampling has been conducted. Dogs live at facility; could be exposed to contaminants.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

☒ Yes  
☒ No  
☐ Uncertain

Additional explanatory notes:

If ground water is contaminated, it could migrate off site to a drinking water well located 0.68 mile north of facility.

### Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

No final corrective measures have been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

No samples have been taken to date to determine if contamination exists at facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes  
☐ No  
☒ Uncertain

Additional explanatory notes:

### Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☒ Solid  
☐ Light non-aqueous phase liquids (LNAPLs)  
☐ Dense non-aqueous phase liquids (DNAPLs)  
☐ Dissolved in ground water or surface water  
☐ Gaseous  
☐ Other \_\_\_\_\_

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles  
☐ Polynuclear aromatics (PAHs)  
☐ Pesticides  
☒ Polychlorinated biphenyls (PCBs) and/or dioxins  
☐ Other organics  
☐ Inorganics and metals  
☐ Explosives  
☐ Other \_\_\_\_\_

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

(X) Yes; Indicate possible course of action.

Removal of 10 PCB transformers would be the initial stabilization activity. Further investigation is required to determine if soil and ground-water contamination exists.

( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

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15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes  
(X) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

(X) Yes  
( ) No

#### Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:

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17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

(X) Yes  
( ) No  
( ) Uncertain

Additional explanatory notes:

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## Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☒ (X) Yes
- ☐ ( ) No, not feasible
- ☐ ( ) No, not required
- ☒ (X) Further investigation necessary

Explain final decision, using additional sheets if necessary.

Removal of 10 PCB transformers that were abandoned at the facility would be the initial stabilization activity. Further investigation is necessary to determine if soil and ground-water contamination is present from the 10 PCB Transformers (AOC 2) and Former Underground Storage Tanks (AOC 1).

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